1 THE HONORABLE RICARDO S. MARTINEZ 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 JAMES GINZKEY, RICHARD Case No.: 2:18-cv-1773 FITZGERALD, CHARLES CERF, BARRY DONNER, and on behalf of the class 10 members described below, **DECLARATION OF SARA E.** 11 HANLEY IN SUPPORT OF MOTION FOR ATTORNEYS' FEES, Plaintiffs, 12 EXPENSES, SERVICE AWARD, AND MOTION FOR FINAL APPROVAL v. 13 **OF SETTLEMENT** NATIONAL SECURITIES 14 CORPORATION, a Washington Corporation 15 Defendant. 16 17 DECLARATION OF SARA E. HANLEY, ESQ. 18 I, Sara E. Hanley, declare, in support of Plaintiffs' Motion for Attorney's Fees, 19 Expenses, and Service Awards, and Final Approval of Settlement as follows: 20 1. I am over the age of 18, have personal knowledge of the facts stated herein, 21 22 and am competent to testify thereto. 23 2. I am one of the attorneys representing Plaintiffs James Ginzkey, Richard 24 Fitzgerald, Charles Cerf, Barry Donner, and the Class. 25 3. I have been licensed to practice law in the State of North Carolina since 2007 26 and the State of Florida since 2013. 27 28 Declaration of Sara E. Hanley HANLEY LAW, P.A.

- 4. I have practiced primarily in the area of securities law since 2007. Specifically, I have been of counsel to Stoltmann Law Offices since 2020. I founded Hanley Law, P.A. in 2017, and from 2007 to 2017 I was the managing partner at the Law Offices of Place and Hanley, PLLC. In total, I have focused my practice on representing investors in securities related litigation and arbitration for the past 15 years.
- 5. I have been appointed class counsel on several other securities related national class actions including *Jyll Brink v. Raymond James & Associates, Inc.*, Case No. 15-cv-60334 United States District Court for the Southern District of Florida; *SEC v. Jay Peak, et. al.*, Case No. 16-cv-21301 United States District Court for the Southern District of Florida; and *Finkel v. Newbridge Securities Corporation*, Case No. 13-60384 United States District Court for the Southern District of Florida.
- 6. I have personal knowledge of the facts set forth herein and if called as a witness, could and would testify competently to these facts under oath.
- 7. The chart submitted correctly reflects my work performed and time spent on this case.
- 8. My hourly rate is \$550.00 per hour which is competitive in the legal market in which I practice.

I declare under penalty of perjury of the laws of the United States that the forgoing is true and correct to the best of my knowledge, information, and belief.

Dated: September 12, 2022.

By: <u>/s/ Sara E. Hanley, Esq.</u> Attorney for Plaintiffs